

# **EXHIBIT B**

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024

1

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF FLORIDA

3 MDL NO.3076

4 CASE NO. 1:23-md-03076-KMM

5  
6 IN RE:

7 FTX CRYPTOCURRENCY EXCHANGE COLLAPSE LITIGATION

8  
9 \_\_\_\_\_/

10  
11 VIDEO AND ZOOM

12 DEPOSITION OF: JASPREET SINGH - VTC

13 DATE: Thursday, February 1, 2024

14 TIME: 2:08 p.m.

15 LOCATION: Northville, Michigan

16 REPORTER: Lory Helland, CER-#3778

17 Certified Reporter

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024  
42

1 A. No.

2 Q. In a motion to the Court, your counsel wrote that,  
3 None of the YouTube Defendants operate any business in  
4 Florida or direct any commerce into Florida.

5 Is that an accurate statement?

6 A. I'm not going to speak on behalf of what my counsels  
7 do.

8 Q. Let's talk about facts, though, because it's a  
9 statement about you.

10 So as it pertains to you, do you operate  
11 any businesses in Florida?

12 A. No.

13 Q. Do you direct any commerce into Florida?

14 A. What do you mean by that?

15 Q. I'm using language from your filing. You don't have  
16 an understanding of what that language means?

17 A. No.

18 Q. Okay. We will come back to it.

19 MS. ALEXANDER: I am going to show you an  
20 exhibit which I'm going to mark as Exhibit 2.

21 (Exhibit #2, Declaration, was marked for  
22 identification.)

23 MS. ALEXANDER: I'm going to scroll to the  
24 end of the document and back up to the top.

25 BY MS. ALEXANDER:

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024  
43

1 Q. Do you recognize this document?

2 A. I don't remember what it is, no, but I do understand  
3 that my name is on it and that I've signed this.

4 Q. Great.

5 So reading from the top, it says below the  
6 title: I, Jaspreet Singh, hereby declare the  
7 following is true and correct to the best of my  
8 knowledge.

9 Do you see that?

10 A. Yes.

11 Q. And it is signed at the bottom, correct?

12 A. Yes.

13 Q. And that is your signature?

14 A. Yes.

15 Q. Great.

16 So I will represent to you this declaration  
17 was submitted to the Court by your counsel. We're  
18 going to talk about a few of the sentences that you  
19 have in here so that I can explore a little bit around  
20 the declarations you've made, so I'd like to start  
21 with sentence three.

22 At all relevant hereto, I have been a  
23 citizen of the state of Michigan and have resided in  
24 Detroit, Michigan.

25 Do you see that?

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024  
44

1 A. Yes.

2 Q. When you say "at all relevant times", what time period  
3 are you referencing here?

4 A. I'm not sure.

5 Q. For purposes of my questions, let's assume that the  
6 year 2022 is the relevant time, since you've  
7 previously testified that your relationship with FTX  
8 US was contained within the year of 2022.

9 Is that fair?

10 A. Sure.

11 Q. If we take the year 2022 to be the relevant time, is  
12 sentence three accurate?

13 A. Yes.

14 Q. During the year 2022, did you travel to the State of  
15 Florida for any reason?

16 A. I don't believe so, no.

17 Q. Do you have any businesses licensed in Florida?

18 A. No.

19 Q. Do you have any personal licenses in the State of  
20 Florida, such as a driver's license, a boating  
21 license, a bar license, or otherwise?

22 A. I do not, no.

23 Q. Great.

24 I am going to take this document down,  
25 although we will be back to it.

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024  
49

1 What about Buzz Legal, was that  
2 incorporated in 2022 or later?

3 A. I also don't recall, I apologize. There's a lot of  
4 entities.

5 Q. Sure.

6 A. I believe I know what you're going to ask, Michigan  
7 and Michigan.

8 Q. Sure.

9 To your knowledge, do you own or control  
10 any business that is not incorporated in Michigan?

11 A. No.

12 Q. And to your knowledge, do you own or control any  
13 business that does not have its principal place of  
14 business in Michigan?

15 A. No.

16 Q. Have any of these businesses ever caused you to travel  
17 to Florida for work?

18 A. No.

19 Q. As I was looking at your website, I noticed that you  
20 have a button that allows a user to submit an inquiry  
21 to book you as a speaker for an event; is that  
22 correct?

23 A. I haven't been on my website in a long time, but it  
24 might be.

25 Q. Have you ever booked a private speaking engagement?

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024

72

1 analytics.

2 MR. ACHO: I'm going to object to lack of  
3 foundation.

4 There's not been one shred of testimony as  
5 to analytics with this witness, none, other than the  
6 attorney questioning her -- him.

7 No foundation. That's my objection.

8 MS. ALEXANDER: You are free to lodge your  
9 objection.

10 BY MS. ALEXANDER:

11 Q. Mr. Singh, which -- strike that.

12 The Minority Mindset team, does it rely on  
13 any analytics provider, whether it be a third-party  
14 organization or a piece of software?

15 A. No.

16 Q. So across all of the social media platforms we've  
17 looked at, do you have any understanding of what  
18 percentage of your viewers are within the State of  
19 Florida?

20 A. Not at all.

21 Q. And you have no -- strike that.

22 You don't have any analytical data  
23 currently within your possession that would allow you  
24 to determine that, to your knowledge?

25 A. That's correct.

JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024

77

1 website to you?

2 A. No.

3 Q. Do you know if they have provided any similar  
4 information to anyone on the Minority Mindset team?

5 A. I don't believe they have, no.

6 Q. Have you ever spoken with Stallion Cognitive about  
7 geographic targeting with regards to your website?

8 A. No.

9 Q. With regard to the videos that you posted on your  
10 YouTube channel, have you removed, hidden, deleted, or  
11 otherwise disabled any videos that you posted in 2022  
12 in connection with your work for FTX US?

13 A. I'm not sure.

14 Q. How would you find that out?

15 A. I'm not sure.

16 Q. Do you know what it means to make a YouTube video  
17 private?

18 A. Yes, I do.

19 Q. Have you ever made any of the advertisements that you  
20 made for FTX US in 2022 private?

21 A. I don't know.

22 Q. Is there any way for you to find that information out?

23 A. Can you be a little more specific?

24 Q. If you wanted to know after this deposition whether  
25 you had made FTX US videos private, do you know how to



JASPREET SINGH  
FTX Cryptocurrency Exchange

February 01, 2024  
104

1 STATE OF MICHIGAN )

2 COUNTY OF OAKLAND )

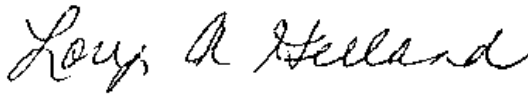
3 Certificate of Notary Public

4 I certify that this transcript is a complete, true,  
5 and correct record of the testimony of WITNESS held in this  
6 case.

7 I also certify that prior to taking this deposition,  
8 WITNESS was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an  
10 employee of or an attorney for a party; and that I am not  
11 financially interested, directly or indirectly, in the  
12 matter.

13 In witness whereof, I have hereunto set my hand this  
14 9th day of February, 2024.

15  
16  
17 

18 LORY A. HELLAND, CER-#3778

19 Notary Public, Oakland County, Michigan

20 My Commission Expires: 02/15/26  
21  
22  
23  
24  
25